

DESCRIPTION AND JUSTIFICATION

1.0 INTRODUCTION

The Verizon Telephone Companies¹ hereby submit tariff pages and supporting data for proposed changes to the Federal Universal Service Fund (“FUSF”) rates associated with the third quarter 2008 FUSF obligation in Verizon Tariffs FCC No. 1 and FCC No. 11 for Verizon-East, Tariffs FCC No. 14 and FCC No. 16 for Verizon-West, and Tariff FCC No. 20 for advanced services. These tariff changes are being filed on 15 days’ notice for effect on July 1, 2008. This filing includes necessary supporting material and is in compliance with, including but not necessarily limited to: the Commission's rules, the CALLS Order released in 2000,² the Contribution Order released in 2002,³ and the Waiver Order released in 2003 (as modified by the Payphone Modification Order released in 2008).⁴

¹ The Verizon Telephone Companies include (a) Verizon Delaware LLC, Verizon Maryland Inc., Verizon New England Inc., Verizon New Jersey Inc., Verizon New York Inc., Verizon Pennsylvania Inc., Verizon Virginia Inc., Verizon Washington, D.C. Inc., Verizon West Virginia Inc.; and (b) Contel of the South Inc. d/b/a Verizon North Systems, Verizon California Inc., Verizon Florida LLC, Verizon North Inc., Verizon Northwest Inc., Verizon South Inc., GTE Southwest Incorporated d/b/a Verizon Southwest, and Verizon West Coast Inc. The companies in (a) will be referred to as Verizon-East. The companies in (b) will be referred to as Verizon West.

² *Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Low-Volume Long Distance Users, Federal-State Joint Board on Universal Service*, Order, 15 FCC Rcd 12,962 (2000) (“CALLS Order”).

³ *Federal-State Joint Board on Universal Service*, Report and Order and Second Further Notice of Proposed Rulemaking, 17 FCC Rcd 24,952 (2002) (“Contribution Order”).

⁴ *Federal- State Joint Board on Universal Service*, Order and Second Order on Reconsideration, Order and Second Order on Reconsideration, 18 FCC Rcd 4818 (2003) (“Waiver Order”), as modified by *Federal- State Joint Board on Universal Service*, Order on Reconsideration, CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, 98-170 (rel. Feb. 14, 2008) (“Payphone Modification Order”).

Federal Universal Service Fund End-User Charge Development

1.1 CALCULATION OF FUSF END-USER CHARGE

Pursuant to the CALLS Order,⁵ amounts assessed for various universal service support mechanisms are recovered directly from end-users. Starting with the third quarter of 2000, the Common Line amount of the FUSF obligation is recovered through a per-line charge assessed to end-user customers to whom End-User Common Line (EUCL) and other interstate charges apply. The contribution and carrier recovery was further explained in the Commission's Contribution Order and subsequent Waiver Order (as modified by the Payphone Modification Order).

Per the Contribution Order, and beginning with the second quarter 2003, with the limited exceptions granted in the Waiver Order (as modified by the Payphone Modification Order), telecommunications carriers are limited to recovering their FUSF contribution using monthly end-user rates that are equal to the total monthly interstate revenues for a customer times the relevant contribution factor. The Waiver Order (as modified by the Payphone Modification Order) preserves the carrier's option to assess the universal service end-user charge on Centrex customers on a per-line basis using the "equivalency" relationships established for the multi-line business PICC for Centrex lines as identified in Section 69.158 of the Commission rules. The Commission also allows carriers to average among certain multi-line business customers the net reductions in charges attributed to the use of the PICC equivalency structure. The interstate Special Access and interstate Incidental Revenue FUSF obligation amount is recovered through an FUSF percentage surcharge using the FCC-prescribed rate applied to interstate end-user revenues.

⁵ CALLS Order, ¶ 221.

1.11 End-User FUSF Charges

Verizon's preliminary obligation to the FUSF for the third quarter of 2008⁶ is based on the FCC's contribution rate rounded to the nearest tenth of a percent times Verizon's projected interstate end-user revenues for the third quarter of 2008 (July through September).⁷ Verizon's recovery of this obligation is derived through end-user FUSF per-line rates for Switched Access services. These rates are determined in a three-step process.

First, interstate monthly charges that apply to each end-user line for EUCLs and line ports are determined for all residential and business lines for each tariff entity. These rates are specified in the appropriate interstate access tariff. The line port charge applies only to digital lines in excess of basic service. Once the tariff rates are identified and summarized for each type of end-user service (*e.g.*, single line residential or business, non-primary residence), the next step of the process begins.

Second, the sum of these interstate per-line charges that apply each month for each type of service is multiplied by the FCC's third quarter prescribed contribution rate to determine the FUSF per-line charge. Interstate rates for each type of service require a corresponding and separate per-line FUSF rate in accordance with the Contribution Order. For example, a separate FUSF rate is

⁶ FCC Public Notice, Proposed Third Quarter 2008 Universal Service Contribution Factor, CC Docket No. 96-45 (rel. June 11, 2008) ("FCC Public Notice").

⁷ Waiver Order, ¶¶ 22-23.

required for primary residential (excluding Lifeline) customers, non-primary residential, and various types of multi-line business services.

Third, the product of these individual per-line rates billed on a current basis would recover Verizon's FUSF obligation for the same period. However, the Waiver Order allows Verizon to bill FUSF charges using the PICC equivalency structure for Centrex customers in accordance with existing FCC rules. The net contribution recovery shortfall caused by billing the PICC structure for Centrex customers is then calculated. The net contribution recovery shortfall is divided by the total contribution requirement to determine a rate adjustment factor ("RAF"). Then, this uniform RAF is applied across all non-payphone⁸ multi-line rates to develop FUSF rates that recover Verizon's quarterly obligation.

The rate calculations for Verizon-East companies and Verizon-West companies are calculated using the same methodology for each tariff entity. The states of Massachusetts and Rhode Island have one common access tariff described as New England. All other states have unique tariffs as shown by WP USF-1.

For both Verizon-East and Verizon-West the proposed changes to the FUSF rate for residential, non-primary residential, single line business and multi-line business-payphone can be attributed to the proposed changes to the EUCL rates (where applicable) and the change in the FCC prescribed contribution factor between the second quarter 2008 and the third quarter 2008 from .113 to .114. Also, for both Verizon-East and Verizon-West, the proposed changes to the multi-line rates can be

⁸ Payphone Modification Order, ¶ 8.

attributed to the proposed changes to the EUCL rates (where applicable), updated multi-line counts associated with the multi-line equivalency calculation and the change in the FCC prescribed contribution factor between the second quarter 2008 and the third quarter 2008 from .113 to .114.

STEP 1 – CALCULATE BASE USF LINE RATE

For each type of end-user customer (*e.g.*, single line residence and business, non-primary residence, and multi-line business), the third quarter 2008 FUSF contribution factor from the FCC Public Notice is multiplied by the sum of the end-user tariff charges applicable each month for the subscriber line and the line port (if appropriate) for each tariff entity to calculate the full-rate FUSF per-line charge. This methodology results in actual per-line FUSF charges for primary residential and single line business, non-primary residential, and multi-line business-payphone; whereas, the resulting multi-line rates become the baseline for multi-line averaging as permitted in the Waiver Order. The calculated full-rate (before the Waiver Order) FUSF charge for each service type and study area is found in WP USF-2.

STEP 2 – CALCULATE FUSF PER-LINE RATES FOR CENTREX EQUIVALENCY

The baseline multi-line FUSF calculated rates from WP USF-2 are carried forward to WP USF-3 so they will align by tariff entity and type of applicable EUCL. As stated above, the exact state specific FUSF rate applies without modification to all primary residential and single-line business, non-primary residential, and multi-line business-payphone customers. The rate calculation for multi-line business customers begins with a full-rate revenue calculation, which is the product of the billing lines for each type of EUCL times the calculated base FUSF rate. Based on the Waiver Order and pursuant to Section 69.158 of the Commission's Rules, the FUSF charge for Centrex is

calculated using the equivalency relationship established for the multi-line business PICC. The detailed multi-line calculations and resulting FUSF rates for each element and tariff entity are found in WP USF-3 and WP USF-3a.

The full-rate Centrex amounts are converted to the PICC structure in column (d) of WP USF-3. This is calculated by dividing the FUSF rate by 9 for Centrex systems with 9 lines or greater, dividing the FUSF rate by 8 for Centrex systems with 8, etc. The monthly contribution recovery shortfall caused by using PICC rates for Centrex is then calculated in column (e) of WP USF-3. An adjusted revenue base is then determined for all multi-line EUCLs by multiplying the units times the PICC rate and adding the other unadjusted multi-line amounts to the total. A RAF is then determined by dividing the Centrex shortfall by the adjusted revenue base – *i.e.*, the difference between the full-rate revenues and those adjusted for the Centrex recovery shortfall. This RAF is then applied to all non-payphone multi-line rates including Centrex, which produces a new per-line FUSF rate that accounts for the Centrex recovery shortfall.

The product of the new adjusted FUSF rates times the billing lines produces the same recovery revenue as the full-rate revenue (before the Centrex PICC structure). Both Verizon-East and Verizon-West reflect the appropriate calculations for each tariff entity as shown on WP USF-3. An additional calculation is required for PBX Trunks with Port Charges for Verizon-East since these trunks cannot be uniquely identified. As a result, the baseline multi-line FUSF charge for only this product as calculated on WP USF-2 is carried forward to WP USF-3a. The baseline rate for PBX Trunks with Port Charges for each Verizon-East state are then multiplied by the appropriate RAF factor to determine the appropriate rate element.

1.1.2 FUSF CHARGES APPLIED ON A PERCENTAGE BASIS

The Special Access FUSF rate is the same as the percentage factor provided in the FCC Public Notice rounded to the nearest tenth of a percent. The FCC's published factor is applied to each dollar of interstate Special Access end-user revenue in Verizon's billing systems.

Also, the FUSF end-user charge applied to incidental types of service is assessed on the same percentage basis as prescribed by the FCC Public Notice. Incidental service consists of non-recurring charges for the Presubscribed Interexchange Carrier (PIC) and the recurring Primary Interexchange Carrier Charge assessed to end-users. The FUSF charge will also apply to interexchange carriers that pay the PIC change charge on behalf of the end-user customer. The FUSF charge on interstate incidental services will also apply to Lifeline customers.

1.2 WORKPAPERS

1.2.1 Introduction

Verizon has provided the necessary detail to support the calculations of the FUSF per-line charge. Following is the index of such Workpapers.

1.2.2 INDEX TO WORKPAPERS

Verizon-East/West

Workpaper USF-1

Summary of third quarter 2008 FUSF per-line Charges

Workpaper USF-2	Calculation of Maximum Switched USF per-line before Waiver Order
Workpaper USF-3	Multi-line Ratemaking for FUSF per-line using Centrex Equivalency
Workpaper USF-3A	FUSF Calculation for PBX Trunks with Port Charges (East only)
Workpaper USF-4	Interstate Special Access End-User FUSF Charge